## **UNITED STATES BANKRUPTCY COURT** FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re: CHAPTER 13

Edward Franklin Dabney and Angelea Michelle Jones

> CASE NO. 20-00555 Debtors

## MOTION TO STOP WAGE ATTACHMENT

COME NOW, the Debtor(s), Edward Franklin Dabney and Angelea Michelle Jones, by and through counsel, Dawn M. Cutaia, of Pugh & Cutaia, PLLC, and respectfully represents

- 1. The Debtors, Edward Franklin Dabney and Angelea Michelle Jones, filed a Chapter 13 bankruptcy petition on February 14, 2020.
- 2. The Debtor Angelea Michelle Jones agreed to a wage attachment and a wage attachment order was entered on March 2, 2021.
- 3. Debtors have filed a Motion to Suspend Plan Payments due to a temporary reduction in income.
- 4. Debtors intend to reinstate the wage attachment at the end of the three month suspension, or if the suspension is not granted, immediately after receiving notice that it was not granted.

WHEREFORE, the Debtors respectfully request this Honorable Court terminate the wage attachment

Date: 11/30/2022

Respectfully submitted, /s/ Dawn M. Cutaia Dawn M. Cutaia, Esquire Attorney ID #77695 115 E. Philadelphia Street York, PA 17401 (717)304-1841 dmcutaia@gmail.com

## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re: CHAPTER 13

Edward Franklin Dabney and Angelea Michelle Jones

Debtors CASE NO. 20-00555

## **ORDER TO STOP WAGE ATTACHMENT**

**AND NOW**, upon consideration of Debtors' Motion to Terminate Wage Attachment, said motion is hereby granted and the wage attachment entered in the above referenced case is hereby terminated.